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February 4, 2004

Via Electronic Submission

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW – Lobby Level
Washington, DC 20036

Re: ***Notice of Ex Parte***
CC Docket Nos. 01-338, 96-98, 98-147

Dear Ms. Dortch:

On February 3, 2004, Christopher Rice, Sr. VP-Network Planning and Engineering, Christopher Heimann, and James K. Smith on behalf of SBC Communications, Inc. met with Bill Maher, Michelle Carey, Brent Olsen, Tom Navin, Robert Tanner, Marcus Maher, Gail Cohen, and Pam Arluk of the Wireline Competition Bureau. The purpose of the meeting was to discuss SBC's fiber deployment plans and issues raised in various petitions for reconsideration as set forth in the attachment hereto.

If you have any questions or need additional information, please do not hesitate to contact me.

Sincerely,

/s/ Christopher Heimann

Attachments

cc: Bill Maher
Michelle Carey
Brent Olsen
Tom Navin
Robert Tanner
Marcus Maher
Gail Cohen
Pam Arluk

Fiber in the Loop Challenges and Solutions

February 3, 2004

Christopher T. Rice
Senior Vice President - Network Planning & Engineering
SBC Communications Inc.



Broadband Vision

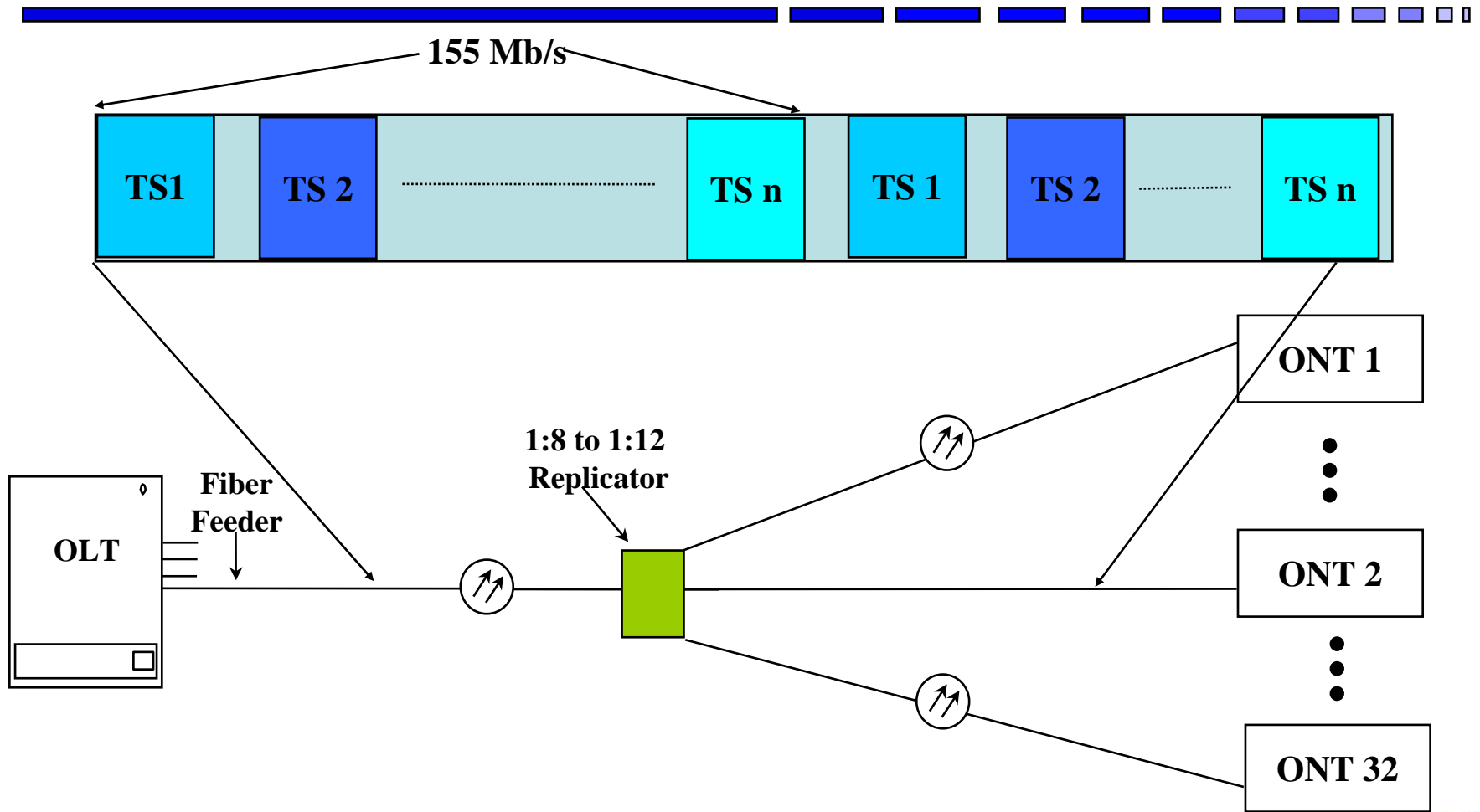
- Integrated voice, data, video services
- Potential applications determined by endpoint electronics
- Standards-based architectures and technologies
 - Supported by multiple vendors
 - Interoperable
- High reliability
- High flexibility
 - Increase overall bandwidth
 - Dynamic allocation of bandwidth
 - Scalability
- Economical installation & maintenance

BPON Standards: ITU-T G.983

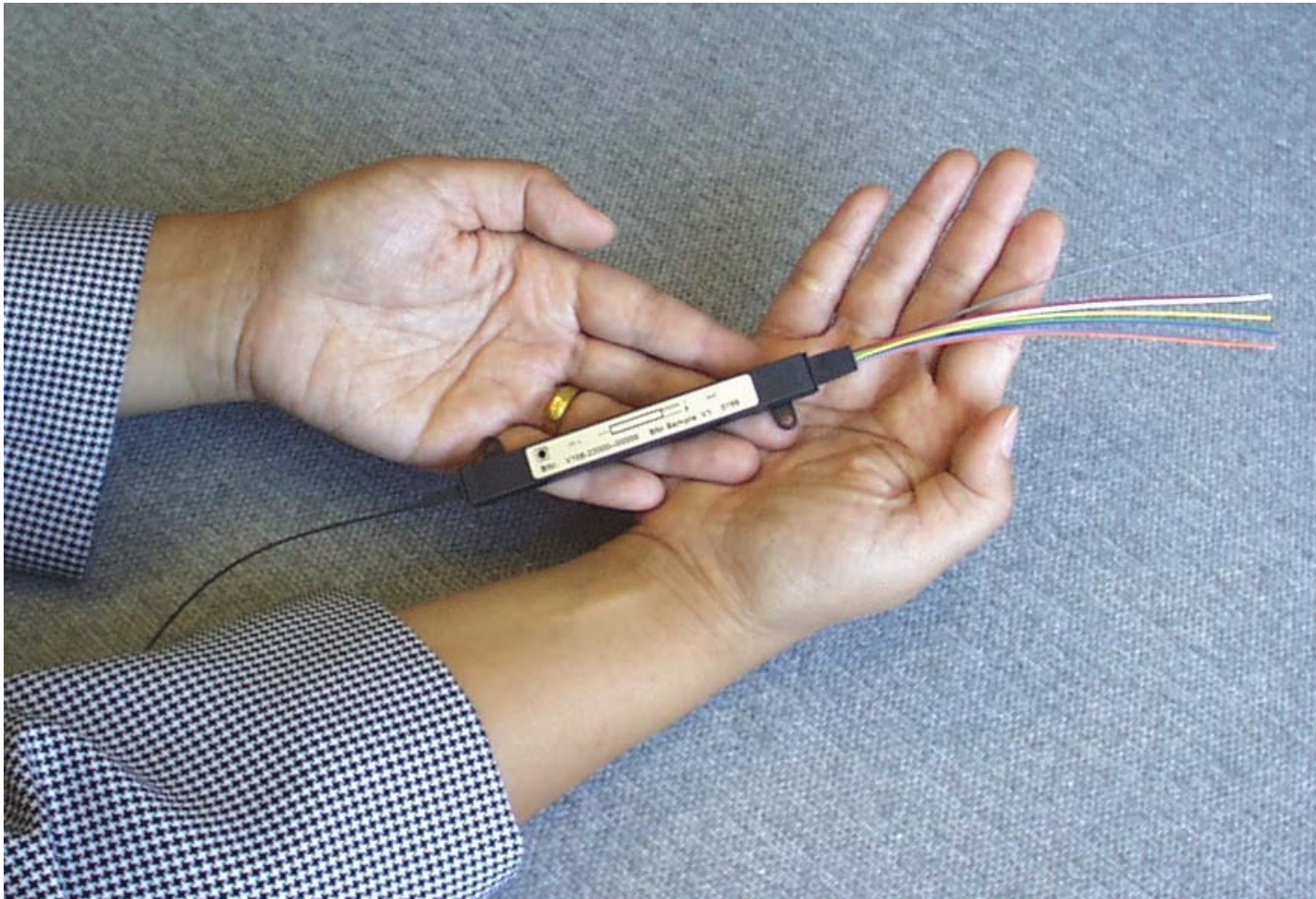
- Data rates: 155 Mbps upstream, 622 Mb/s or future 1 Gb/s downstream
- Split ratios: Up to 32 ONTs
- Logical reach: 20 km (~60 kilofeet)
- ONT placement: 0 to 20 km
- Splitter placement: 0 to 20 km
- Frame format: Modified ATM cells
- Optical power budget: up to 30 dB
- Wavelengths:
 - Upstream 1310 nanometers; Downstream: 1550 nanometers
 - 1490 nanometers is planned when video is introduced

BPON

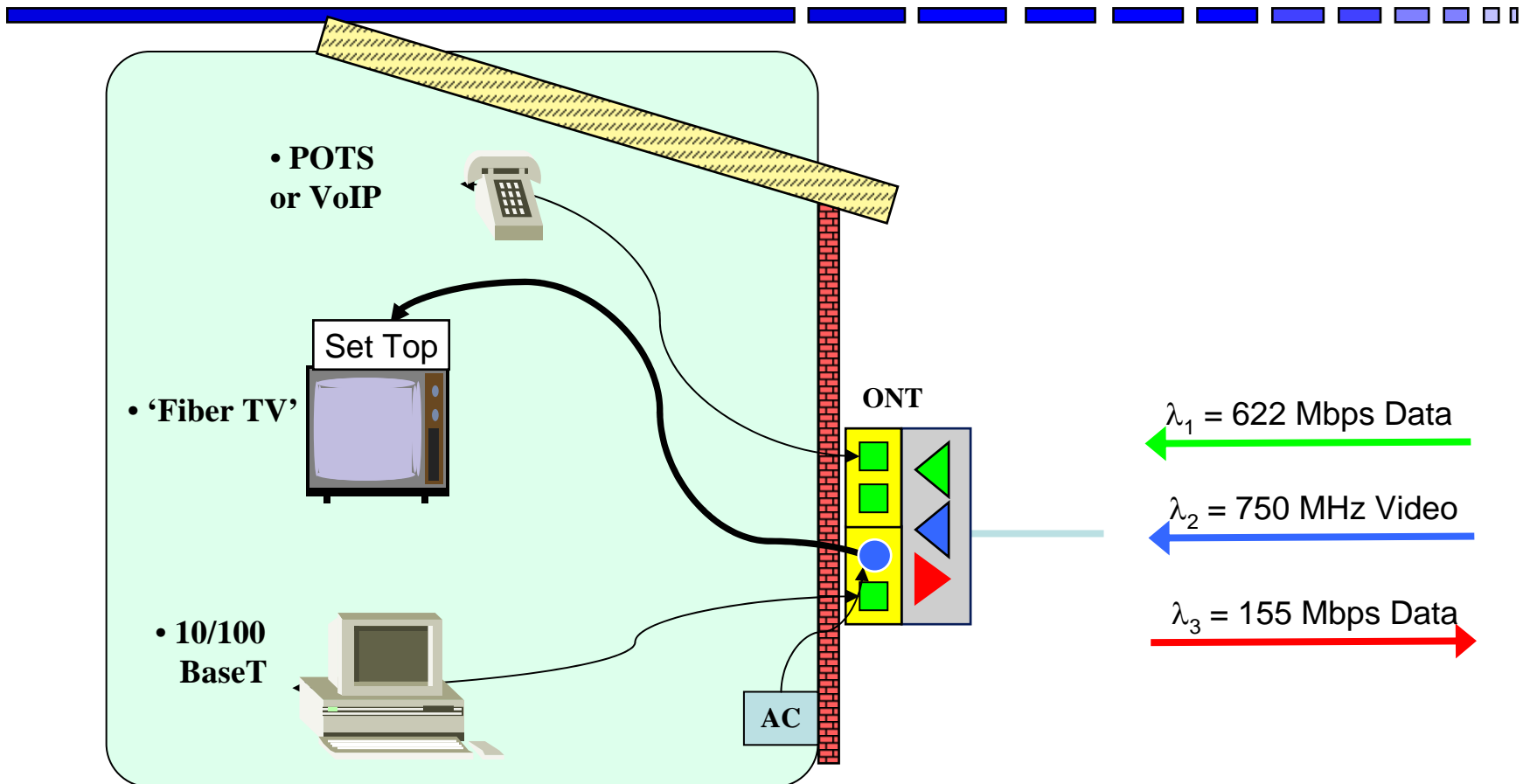
Broadcast downstream; TDMA upstream



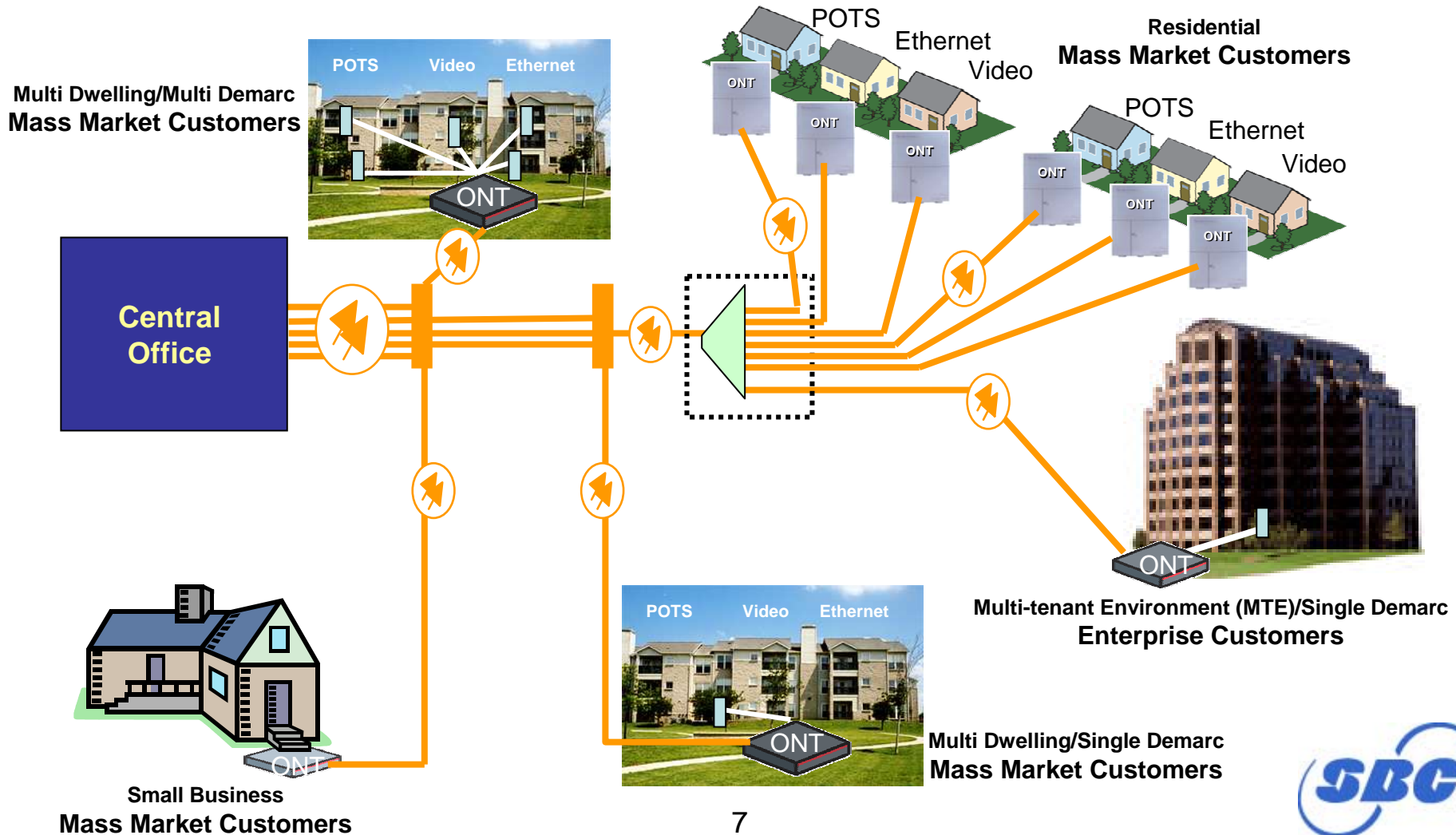
Passive Optical Replicator



FTTP – Customer Premises



Fiber In The Loop Serves Many Purposes



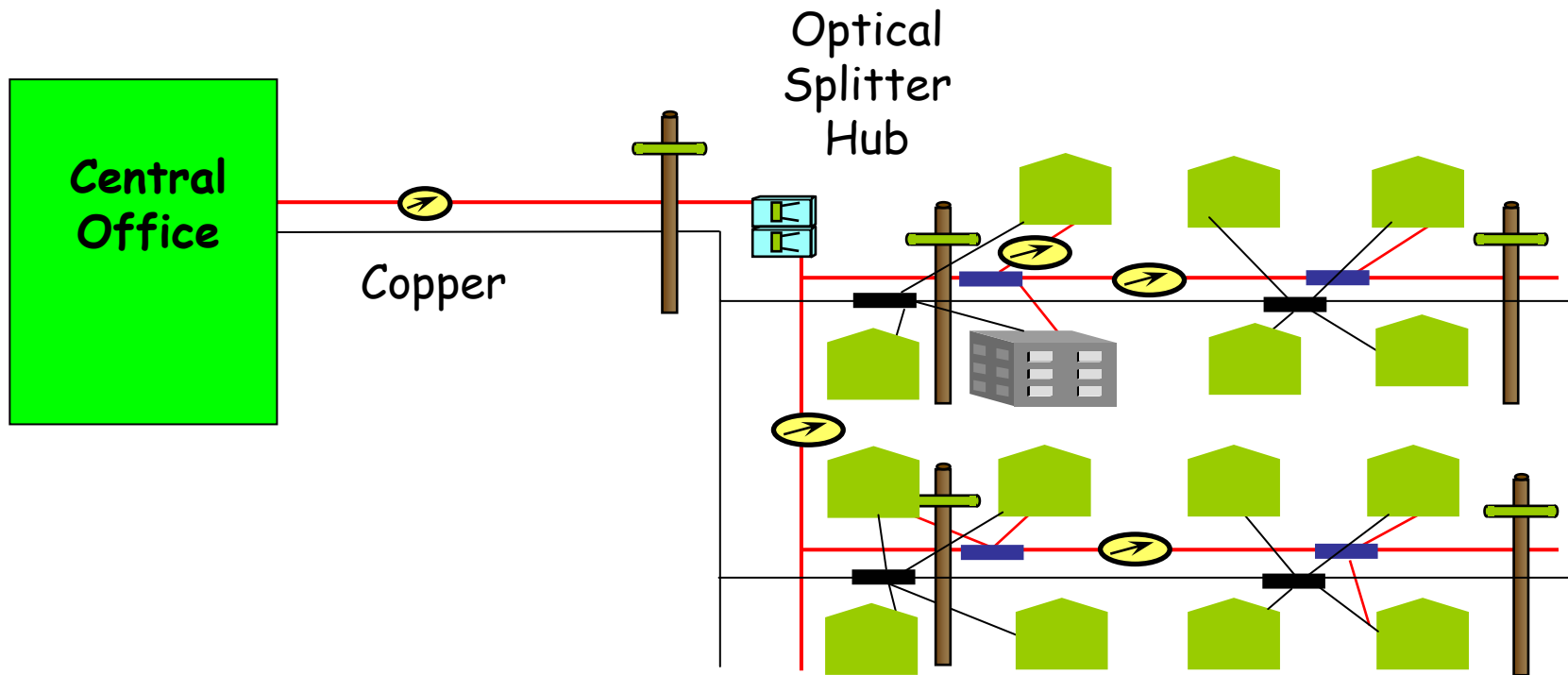
SBC FTTP Plans

-
- Mission Bay deployment in San Francisco, CA -- operational since 9/30/03.
 - 1H/2004- Trials with Alcatel in five cities
 - Trials to focus on operationalizing new network architecture: inventory, provisioning, repair, etc.
 - 2H/2004 – Limited deployment in greenfield applications.
 - 2005 – deploy in new builds (~300k premises/yr)

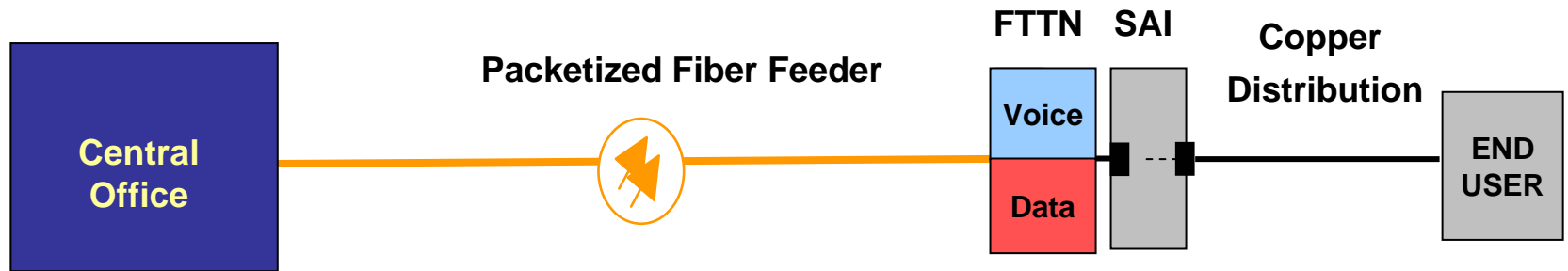
FTTP Deployment Implications

- Greenfield deployment for Multi-dwelling Units (MDU), small business and certain single family units (SFU).
- Brownfield deployment for aerial facilities meeting similar criteria.
- Brownfield deployment for FTTP where distribution facilities are buried is expensive:
 - Push fiber closer to the SAI, referenced as Fiber to the Node (FTTN).
 - Use single fiber, packetized feeder facility.

FTTP Construction Brownfield Overlay (Aerial)



Brownfield Buried Alternative Fiber to the Node (FTTN)



This architecture pushes fiber closer toward the customer premise, but likely not within 500ft.

Reject Attempts to Curtail Exemption of Packet Switching From UNE Regulation

- TRO set forth national policy that must not be undermined.
- Broad scope of exemption is clear and unambiguous
 - Attempts to bootstrap DS-1/DS-3 UNE requirements to packet facilities is a back door attempt to gut the packet switching exemption.
- Commission must continue to be absolutely clear in affirming the scope of the exemption to avoid ambiguity, particularly at the state level.

Reject CLEC Demands For TDM Deployment Where None Exists

- CLECS are attempting to dictate ILEC network design and evolution.
 - ILECs are not required to design, reconfigure, or modify next generation networks
 - will increase ILEC costs, force inefficient network design, and undermine ILEC incentives to deploy broadband.
- Maintain criteria for TDM availability:
 - TDM capability currently available in existing loops; AND/OR
 - Any new TDM capability that an ILEC deploys or routinely would deploy for its own customer.

FTTP Rules Must Not Chill New Fiber Loop Investment

- Difficult to rationally design next generation networks with “voids” because particular buildings (or customers therein) are subject to differing unbundling obligations
- New fiber loop investment should be exempt from unbundling
- At a minimum, dark fiber loop rules should be limited to enterprise dark fiber existing as of the release date of the TRO

FCC TRO Broadband Policy is Right but requires certainty

- Maintain clear and unambiguous exemption of “packet switching” from UNE regulation
- Reject CLEC demands for TDM deployment where none exists
- Exempt new dark fiber loop investment from UNE regulation
- Reconcile Section 271 obligations with Section 251 determinations